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MEMORANDUM

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May 15, 1991

TO: Robert Swale  
Mail Code SHS-11  
U.S. EPA, Region V  
230 South Dearborn  
Chicago, Illinois 60604

VIA FAX: 312/886-4071

FROM: Peter J. Vagt  
[215/964-0808]

RE: Preliminary Listing of Comments of Concern  
Draft RI Report  
ACS NPL Site

Section 1

There are several places in which you have requested we put in specific wording regarding activities and waste locations on site. In several cases, we will ask ACS Inc. to provide us with the actual facts. For others we will need to reference the source, which EPA will need to provide to us (i.e. #6, #19).

Section 2

Only major comment is on #24. The purpose of the geophysics was to identify the appropriate areas to drill. That purpose was accomplished, and the drilling locations were selected. Phase I drilling was conducted on the basis of the geophysics, and further drilling was conducted in Phase II on the basis of Phase I drilling. Further evaluation of geophysics data is irrelevant at this time.

Section 3

In a write-up of a complex investigation such as this, the information is inter-related and it is difficult to know what to put first. The purpose of this section is to describe the overall process of the phased approach to investigation. Some amount of information is included to show why the Phase II Scope was selected. But care was taken not to put in too much in the way of conclusions, so that this section would not be read as providing any real analysis of the data.

A lot of the agency comments look as though they were written on the first pass through the RI report. In this case, there are certainly areas where the reader would like a little more information. However, often that information is better left until a later section.

We do not want to be providing an evaluation of the site in Section 3, only the information to help understand the logic and sequence in the over all 3-phased project.

Many of the requests for additional information make sense, and it will be easy to provide some additional explanation. But in some cases, I feel that you are asking for too much information, given the organization of the Report. Those are cases where we have avoided putting in the information, because it is better to combine the info with the Phase II (and III) information later to provide an evaluation of the site, in the section where that is the objective.

#### Section 4

No major issues, but a bunch of trivial issues we need resolved.

#### Section 5

Several of the comments ask for additional overlays, or additional contour lines on the overlays. The overlays we provided are adequate and sufficient for the sampling resolution.

The purpose of them was to provide a quick but detailed, conceptual view of where the contaminants are in 3-D. The data does not really justify a higher resolution. We provided multiple overlays. To add multiple contour lines would make the overlays less useful rather than more useful. The data numbers are provided so that the reader can visualize where the higher and lower concentrations would be.

The text and the overlays provide the guide to focus the reader on the areas of concern. The raw data in the appendices provides the specific compound by sample data you are suggesting here.

#### Sections 6 and 7

Kevin tells me that you've already gotten his list of questions on sections 6 and 7. We'll be prepared to discuss as many of those as we can without Pat VanL.

See you at 10:30

WARZYN ENGINEERING INC.  
CHICAGO, ILLINOIS

BY \_\_\_\_\_ DATE 5/16/91 SUBJECT Mety & EPA SHEET NO. \_\_\_\_\_ OF \_\_\_\_\_  
CHKD. BY \_\_\_\_\_ DATE \_\_\_\_\_ ACS RI Comm JOB NO. \_\_\_\_\_

Robert Swales	RPM, U.S. EPA Region V (312) 885-5116	
DAN SPARKS	US Fish & Wildlife Service (812) 334-4265	
BOB BROD	WESTON	708 918 4000
Jim BURTON	WESTON	708-918-4000
MARVIN METGE	PRP. TECHNICAL COMMITTEE (ATTY-ESXT)	312-236-2713
Jennifer Nijman	PRP Committee/Coffield Ungaroli Harris & Slavin	312-977-4400
JOE ADAMS	WARZYN	708-691-5020
Julie Widman	Warzyn	708-691-5070
TOM GRAAN	WESTON	708-918-4000
Karen Kracko	ERT/TAT-Weston	908-225-6266
Peter Vagt	Warzyn	215-964-0008
Jerry Kelly	Warzyn	608-231-4747
DAVID W. CHARTEES	EPA/ERT	908-906-6825

WARZYN ENGINEERING INC.  
CHICAGO, ILLINOIS

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